



U.S. Environmental Protection Agency

**ACTION PLANS TO INTEGRATE  
ENVIRONMENTAL JUSTICE**

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**THE OFFICE OF PREVENTION ,  
PESTICIDES, AND TOXIC SUBSTANCES**

**ACTION PLAN 2002**

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# Executive Summary

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## SECTION I. OPPTS ENVIRONMENTAL JUSTICE POLICY

Introduction: The Office of Prevention, Pesticides and Toxic Substances (OPPTS) is committed to promoting and supporting Environmental Justice (EJ). EJ is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. Fair treatment means that no group of people, including any racial, ethnic, or socioeconomic group, should bear a disproportionate share of the negative environmental consequences resulting from industrial, municipal, and commercial operations or the execution of federal, state, local, and tribal programs and policies. OPPTS employees shall consider potential issues or concerns of EJ in all program activities including employment, education and outreach, regulatory activities, data management, enforcement, contracts and grants, communication, and planning. Work plans will address EJ concerns and be evaluated systematically to ensure adequate focus on program activities.

Employment: OPPTS policy is to recruit, hire, promote, train, and transfer individuals of diverse backgrounds within all levels of EPA so that the composition of the program reflects the diversity of the people it serves. Such a policy facilitates decision-making that includes a broad range of experience and understanding, and takes into account diverse views and perspectives.

Education and Outreach: OPPTS' policy is to foster a heightened awareness of EJ issues, both within EPA and among those most threatened by environmental risks. Headquarters will develop and implement EJ training, promote increased communication of EJ issues in a manner that has a measurable impact on affected communities, coordinate with Regional and State Offices, and provide general environmental education to targeted populations. EJ Coordinators will inform the program offices of initiatives, issues, and available training on an on-going basis. OPPTS will seek opportunities to provide training to all employees.

Regulatory Activities: OPPTS' policy is to maximize the use of EPA's statutory authority and practical influence to protect public health and the environment in a manner that openly addresses EJ issues. OPPTS managers and staff will consider EJ in developing policies, regulations, and permit registrations and will coordinate, as appropriate, with other federal agencies, including interagency agreements that incorporate EJ issues. OPPTS will continue to promote stakeholder involvement to gain meaningful input regarding environmental decision-making and program implementation .

Data Management: OPPTS will ensure that its program managers and staff have access to the

current information and analytical support necessary to successfully identify, evaluate, and resolve EJ issues during the development stages. Enforcement: OPPTS will consider EJ principles as it relates to the Regions, States, and local governments ability to enforce permits and regulations. Also, consideration will be given as to how to include EJ concerns in voluntary program activities.

Contracts and Grants: OPPTS will ensure EJ considerations through contracting and grant policies and procedures to increase opportunities to heighten awareness and promote EJ outreach.

Communication: OPPTS will improve and expand its communication effort by keeping citizens and stakeholders, especially those in people-of-color and low-income communities, abreast of emerging Agency policy. OPPTS recognizes the sensitivity and concern that issues such as risk assessment, risk management, and risk communication present to people-of-color and low-income communities. OPPTS will reach out to these and external constituencies by enhancing its outreach activities through use of the internet, public meetings, Federal Register Notices, and other more traditional and non-traditional communication tools.

Planning: Implementation of this Environmental Justice Policy will be incorporated into the OPPTS Strategic Planning framework. Progress will be monitored as part of the midyear and annual review process.

Review Mechanism: The Assistant Administrator shall ensure that OPPTS EJ goals and issues are being met through a regular review process that includes evaluation of strategic plans, periodic review of regulations and permits, and any other activities deemed necessary.

## **SECTION II. RESPONSES TO EJ ACTION PLAN NARRATIVE**

### **Part A. Office of Pesticide Programs**

#### **I. Overview and Goals**

The Office of Pesticide Programs (OPP) is committed to providing fair treatment of all constituencies, regardless of race, culture, or economic status, and to the involvement of these constituencies in the decision making process of regulating pesticides. OPP has programs in place that are considerate of environmental justice, including programs devoted to protecting potentially at-risk sub-populations. Individuals of these sub-populations, as well as the general population, can be exposed to pesticides through a variety of sources - from fruit and vegetables and other foods in the diet or from casual contact in residential settings. Agricultural farm workers can be exposed to pesticide residues from contact with treated plants or soil, and can bring those residues home on their shoes and clothing. Pesticides can drift from crops to nearby homes and other residential areas.

Some sub-populations that may be exposed to pesticides include those whose diet or activities depend on commodities that may bear pesticide residues. For example, Native American tribes who use forest products in their cultural activities may be especially exposed to herbicides used to keep the forest floor clear for brush control. Other sub-populations may have increased exposure to pesticide residues from the fish in their diets. Recognizing there are unique risks to sub-populations, OPP plans to improve our ability to assess and manage these risks, as resources permit.

In addition to providing protection from adverse pesticide risks, OPP is also committed to fair treatment of constituencies in terms of regulatory availability of pesticides when needed. For example, tribes as growers in states occasionally have need for unlicensed pesticides to control unusual pest outbreaks (an emergency exemption). OPP is working with tribal governments and USDA to provide such access to the emergency exemption process.

Input from the affected constituencies is an important element in ensuring that environmental justice is attained. OPP communicates with many constituencies that are affected by pesticide regulation and use, including those that represent farm workers and tribal governments. The open communication with these groups improves both OPP's understanding of exposures and our ability to assess and protect these and other sub-populations.

#### **II. Current Status of Environmental Justice Activities in OPP**

OPP incorporates elements of environmental justice in many of its day-to-day programs and initiatives. We collaborate with constituencies that represent vulnerable sub-populations, develop materials and information in multiple languages that are routinely used to reach out to potentially affected groups, support and provide education for health care professionals to learn

to identify, manage, and treat pesticide poisonings in potentially affected populations, provide laboratory analytical support to ascertain whether environmental contamination has occurred, and provide resources for technical information in several media.

In a larger perspective, OPP encourages public participation in its decision-making through public comment periods on risk and benefits assessments and regulatory decisions, conducting technical briefings on pesticides in reregistration, posting information to our website, and communicating with the states and regional offices. OPP has instituted the CARAT (Committee to Advise on Reassessment and Transition) and the PPDC (Pesticide Program Dialogue Committee) to more effectively and efficiently gather input from stakeholders. Both groups include representation from farm worker advocacy groups, public health organizations, and tribal governments. Pesticide issues and decisions are electronically communicated to interested parties from a centralized mailing list, including those identified by the People of Color Environmental Groups Directory, a compendium of ethnically diverse groups with an interest in the environment and public health. Many other examples of how OPP reaches out to potentially at-risk populations exist, and are identified in the Environmental Justice Action Plan Matrix.

OPP encourages stakeholder involvement in its decision-making. For example, funding is provided to tribal entities that focus attention on pesticide issues and concerns, and they in turn are able to relay those issues and concerns back to EPA. One such group, the Tribal Pesticide Program Council (TPPC), has expressed concerns for the unique pesticide exposures in their communities. As a result OPP began an effort, working in conjunction with tribal community members, to begin to develop a new risk assessment tool to deliver pesticide risk assessments germane to tribal culture and lifestyle.

OPP is actively collecting data that have relevance in environmental justice applications. For example, the Tribal Lifeline project is intended to capture tribal lifeways for use in risk assessment software, with the potential result of more refined risk assessments for the described communities. OPP is also working with NIOSH (National Institute for Occupational Safety and Health) to develop a pesticide poisoning surveillance system. The National Pesticide Information Center collects information that can be relevant to environmental justice. From a study of certified applicators conducted jointly with NIOSH and the National Cancer Institute, OPP expects to more clearly understand the relationship between use practices and long-term health outcomes.

OPP routinely confers with groups that represent farm workers, and through workshops, meetings, and other communications, and has received valuable input on its programs. In addition, a national assessment of the worker protection program has recently been completed that will help the Agency determine whether the WPS program is adequately meeting its intended goals of addressing the risks to agricultural workers. OPP funds the Hispanic Radio Network to provide information from OPP to farm workers in their native language. Most OPP farm worker-based information is available in Spanish as well as English, and some is available

in several languages.

OPP is also active in training programs directed towards agricultural workers, their children, health care providers, and others as a way to protect people from pesticide exposures. OPP provides information in several media to persons concerned about pesticide exposure and their risks. Laboratory analysis of specific environmental contaminants is also conducted on occasion.

### III. Actions to Improve Integration of EJ into OPP

OPP is committed to reviewing our existing processes and identifying potential areas for improvement in environmental justice actions. There are several areas identified in the matrix, resources permitting, where more may be done to incorporate environmental justice.

OPP intends to begin to improve its capacity for assessing risks to potentially highly-exposed communities from pesticide residues in drinking water. OPP plans to develop scenarios for these higher exposure communities and collect monitoring data in areas of highest usage.

In addition to improved risk assessments, OPP recognizes regulatory activities may be improved through analysis of processes and implementation of environmental justice components. Through the upcoming year, OPP will focus on environmental justice opportunities in existing processes in the areas described in the matrix.

Finally, OPP's ability to measure performance more adequately will result in a better understanding of the outcomes of activities related to environmental justice. With this increased understanding, OPP can deploy resources to best effect environmental justice situations.

### IV. EJ Coordinator

The Office of Pesticide Programs plans to identify an environmental justice coordinator soon. This individual may be responsible for a number of environmental justice components, including developing a training program for current and new OPP employees in EJ awareness and fundamentals and developing relevant guidance as needed; working with OPP divisions to increase awareness of EJ opportunities; coordinating with stakeholders on issues of environmental justice; developing reports and responding to inquiries; participating in meetings, workshops and in other settings; and for developing mechanisms to communicate with other agency programs on EJ issues.

This coordinator will work with OPP's Special Emphasis Program Managers (SEPMs) to provide support and insights into environmental justice issues, and help develop linkages outside the program to stakeholders.

**Part B. Office of Pollution Prevention and Toxics (12/31/02 version)**

**I. Overview and Goals**

The Office of Pollution Prevention and Toxics (OPPT) is committed to providing fair treatment of all constituencies, regardless of race, culture, or economic status, and to the involvement of these constituencies in the decision making process for identifying, assessing and managing industrial chemical risks and efforts to prevent pollution. To this end, OPPT's focus on environmental and human health protection is framed by three legal authorities: the Toxics Substances Control Act (TSCA), the Residential Lead-based Paint Hazard Reduction Act (RLPHRA), Title X, and the Pollution Prevention Act (PPA). Title I of TSCA requires the control of chemical substances, except pesticides and drugs, the oversight of chemical life cycle through manufacture, importation, processing, commercial use and disposal, and the review of premanufacture notices for new chemicals. Titles II and III address asbestos in schools, public and commercial buildings, and lead exposure reduction, respectively. RLPHRA, Title X, requires HUD and EPA to develop regulations requiring disclosure of lead paint and lead hazards. PPA promotes pollution prevention as the preferred solution to end-of-pipe controls to reduce or eliminate pollution and waste at the source.

This statutory framework differs from the other media offices in the Agency in that it looks at industrial chemicals and associated potential risks rather than on a single media such as air, land or water. Therefore, OPPT's efforts are focused on the risk continuum of risk identification, prevention/reduction and risk management. Chemical regulations, policies and programs are aimed at reducing and eliminating toxic risks to communities. The general population can be exposed to industrial chemicals through a variety of sources - manufacturing process, uses, and disposal. OPPT considers exposure impacts to EJ communities as a critical component of the TSCA risk assessment process and the promotion of pollution prevention. OPPT continues to initiate programs, outreach strategies, and initiatives to improve its ability to assess and manage these risks. OPPT has programs in place that are considerate of environmental justice, including programs devoted to protecting potentially at-risk people-of-color and/or low income populations.

The management of risks already known is a critical component of the office's environmental justice efforts, especially for national chemicals of concern such as lead (Pb), asbestos, PCBs and mercury. One of the most important, to date, is the lead program which has geared much of its efforts toward reaching poor, people-of-color children living in inner city areas. OPPT has achieved many accomplishments in this area and continues to address this critical concern. These national chemicals of concern also have a great impact on communities with a subsistence culture, especially the Tribes.

Risk identification and the prevention/reduction of risks are key to addressing or eliminating current and future environmental justice concerns. OPPT has and continues to develop tools to assist EPA, communities, governments and others to target areas of concern due to manufacture

or use of industrial chemicals. Many of our programs, including new chemicals, the High Production Volume and the Voluntary Children's Chemical Evaluation Programs (described below), are designed to assure that adequate information is available to EPA and/or to the public to assess risks from exposure to chemicals in local environments. OPPT's efforts to help reduce environmental risks in disadvantaged and people-of-color communities go beyond reducing and managing risks to preventing pollution and waste at the source. It is OPPT's practice to be proactive. Adhering to pollution prevention (P2) principles can help protect disadvantaged and people-of-color communities at the front end rather than attempting to address problems after communities are already at risk or have been harmed..

OPPT also supports the National Environmental Justice Advisory Council's (NEJAC) Health and Research, Pollution Prevention and Indigenous Peoples Subcommittees, and leads the Forum on State and Tribal Toxics Action's (FOSTTA) Tribal Affairs Project. It is also anticipated that the new OPPT FACA, the National Pollution Prevention and Toxics Advisory Committee (NPPTAC), will address environmental justice concerns and considerations.

## **II. Current Status of Environmental Justice Activities in OPPT**

Over the years, OPPT has been actively involved in addressing environmental justice issues and has, as a result, incorporated elements of environmental justice in many of its current programs and activities. This is supported by the management commitment to ensure the goal of environmental justice is achieved and through the office's risk continuum approach of risk identification, reduction/prevention and management. OPPT has established communication strategies that engage community support and outreach as a major cornerstone of the program.

### **A. Risk Management**

Much of the effort to address the concerns facing environmental justice communities are in response to known risks from chemicals of national importance. With respect to OPPT's authorities, the main concerns are lead, asbestos, PCBs and mercury. At this stage, the majority of efforts are on managing the risks associated with these chemicals. OPPT has and will continue to consider the implications of these risks to environmental justice communities in developing regulations, policies, guidance and implementation decisions, and to manage its programs to effectively involve impacted constituencies in the decision process.

#### Lead

Lead poisoning is most prevalent in poorly-maintained older housing, and the population most at risk is poor, people-of-color children living in inner city areas. Much of EPA's effort to combat lead poisoning is geared towards reaching this population most at risk, and the entire program reflects the Agency's ongoing commitment to environmental justice. The overall program goal is to decrease the number of children with elevated blood lead levels.

EPA uses three general strategies to address environmental justice issues in the lead program:

- Promote greater availability of lead risk identification and reduction, at lower cost.
- Empower parents and other caretakers to protect children directly through effective communication tools; and
- Encourage improved maintenance of low-income dwellings.

Using these strategies, we have achieved many accomplishments, and are working on many more. Through rule development, grants and technical studies, an infrastructure has been established to address lead risks. Bilingual educational materials and a national lead awareness campaign have been developed for parents, homeowners and renters, utilizing hotlines, bus posters, doctors office/clinic posters and radio and television spots. Utilizing sources, including the National Health and Nutrition Examination Survey (NHANES) report on the number of children lead poisoned, we are able to track progress on this critical risk that impacts many in the nation's older, dilapidated housing.

#### Asbestos/PCBs/Mercury

In addition to lead, OPPT develops regulations, policies and guidance for other national chemicals of concern, including asbestos, PCBs and mercury. OPPT's asbestos program addresses concerns with schools, homes and office buildings, and targets efforts towards protecting asbestos abatement workers for these facilities. Through FOSTTA, we continue to identify assistance needs for asbestos abatement/management on tribal lands, and look for ways to provide tools and funding. The PCB program reviews permits, determining the best solution for the surrounding communities which can be people-of-color or low-income communities. With the increase in weapons destruction and closing of military units, this has become increasingly important to environmental justice communities. EPA's draft Mercury National Action Plan describes a comprehensive approach to reducing health risks from mercury exposure. EPA fully understands that health threats from mercury exposure are of critical importance for a number of special populations most at risk. Of particular concern are pregnant women, young children, Indian Tribes and other cultural groups who routinely consume large amounts of fish, as well as, Health Care Without Harm, the American Nurses Association, and cultural groups who engage in ritualistic uses of mercury. OPPT is continuing to promote the Hospitals for a Healthy Environment (H2E) program by working with the American Hospital Association (AHA) and other program partners to ensure that health care facilities located in EJ communities are identified and afforded the tools and information necessary to reduce mercury waste, reduce the overall volume of waste, and identify pollution prevention opportunities.

#### **B. Risk Identification and Reduction/Prevention**

OPPT's responsibility to identify hazards and risks is critical to environmental justice communities. Only once the risks are known can the problems be prioritized and addressed most effectively. OPPT has developed a number of programs and tools to assist the Agency and others in this identification process. Outreach to the general public and specific populations with these tools and information on chemicals of concern is a key ingredient in our efforts to assist

environmental justice communities. Specific projects and grants have assisted in reducing risk identified nationally and/or locally. Preventing the pollution at the source has been one of our targeted areas to promote environmental justice progress.

### Pollution Prevention

Through a variety of approaches, this office seeks opportunities to advance pollution prevention to affect change for environmental justice communities. Approaches include working collaboratively with industry, communities and local governments, partnering with other EPA offices, providing support to the NEJAC P2 workgroup, and heading the FOSTTA P2 project. A primary objective is to identify and address the needs that may exist in environmental justice communities. These groups provide options to address the needs with respect to local and state requirements.

Design for the Environment (DfE) Partnerships continue to include an assessment of impacts on the community, particularly for the industry sectors made up of many small (“Mom and Pop”) shops. These kinds of businesses are often located in EJ communities, and DfE projects such as the automotive refinishing project have been successfully implemented in EJ communities. The overall goal of the DfE Program is to work with industries to incorporate environmental concerns into their everyday business decisions and practices. This includes focusing more on activities in shops while also educating the industry on concerns for the community as well as the environment. The DfE projects include automotive refinishing, adhesives, computer display, garment and textile care, flexographic printing, formulator, gravure printing, industrial and institutional laundry, integrated environmental management systems, Pb free solder partnership, lithographic printing, printed wiring board, and screen printing. DfE partnerships also carefully consider translation needs-- the DfE dry cleaning project developed materials in Korean, the printing project developed materials in Spanish, the Region 6 nail salons project plans to translate materials into Vietnamese and Korean, and DfE’s automotive refinishing project materials were recently translated into Spanish by the California Air Resources Board.

Green Chemistry and Green Engineering tools and presentations continue to be introduced to people-of-color (such as at the National Organization for the Professional Advancement of Black Chemists and Chemical Engineers (NOBCCChE) Annual Conference) and international (the Gordon Conference) audiences highlighting the need for new (that is “greener”) ways of manufacturing, processing and utilizing chemicals, even replacing hazardous chemicals with environmentally better and healthier alternatives.

In partnership with other EPA offices, OPPT is providing economic and technical support to the NEJAC P2 workgroup. Proposals from the group include: develop and promote implementation of a multi-stakeholder collaborative model, identify and implement opportunities to advance EJ through P2 in federal environmental statutes, promote product substitution and process substitution in areas which impact low-income, people-of-color and tribal communities.

### New and Existing Chemicals

OPPT oversees two critical activities designed to provide the Agency and the public more information on the hazards of a large number of industrial chemicals: the High Production Volume (HPV) Program and the Voluntary Children's Chemical Evaluation Program (VCCEP). These programs are designed to assure that adequate information is available to the public to assess risks from exposure to chemicals in local environments. The programs have two components: information collection (including data development) and public dissemination. Specifically, the HPV program will generate basic toxicity data on most of approximately 2,800 high production volume chemicals (those chemicals manufactured or imported in amounts equal to or greater than one million pounds per year), and VCCEP will assess the risks to children from 20 chemicals to which children are disproportionately exposed.

OPPT administers the New Chemicals Program under TSCA, section 5, which gives EPA broad authority to identify and control new chemical substances that may pose a risk to human health or the environment. The New Chemicals Program serves as a "gatekeeper" to prevent such risk, including risk to the general population, including subpopulations that are identified through the exposure assessment.

In addition, OPPT is supporting the NEJAC Health and Research Subcommittee by working with the Subcommittee to identify ways cumulative risk assessment can effectively be used to better address environmental health disparities in EJ communities, and identify and address EJ issues related to the development and implementation of the Framework for Cumulative Risk Assessment.

### Tools

OPPT has established a Community Assistance Technical Team (CATT) to develop and provide tools and training to help communities evaluate and improve their environments. The team has been working to develop tools to help communities and their partners understand and use scientific and technical information and data to find effective ways to improve local environments. The team, in a collaboration with the Agency for Toxic Substances and Disease Registry and the Office of Air, has developed and will publish a Community Air Screening How To Manual designed to help communities prioritize and take effective action to reduce risks from air toxics.

OPPT has also developed several risk screening, priority setting, and exposure assessment tools which will be valuable in supporting EJ hazard, exposure, and risk assessment activities. For example, the Risk Screening Environmental Indicators (RSEI) can be utilized to support a wide variety of activities at various government levels from national to community. In particular, it can be used for identifying EJ problem areas, ranking relative risks for priority action, and mapping geospatial relationships of risk-related chemical releases to populations of interest. This tool can also be used to address these relationships for tribal populations and other ethnic groups. The RSEI tool combines population demographics, exposure estimates, and measures of toxicity to provide relative risk-related screening analyses. The Exposure, Fate Assessment Screening Tool (E-FAST) is another tool which provides screening level assessments of

consumer, general population, and environmental exposures for use in a risk assessment context. The Internet Geographical Exposure Modeling System (IGEMS) is currently under development and will provide detailed assessments of general population and environmental exposures for air, soil, surface water, and ground water releases. All of the models can be tailored to support EJ community analyses by modifying the model input values to reflect the appropriate population of interest.

In addition to disseminating data, information, and tools such as these, OPPT has the expertise to develop “Train the Trainer” materials based on the How To Manual and tools which could be used by communities and others for addressing EJ issues. The Community Assistance Network established by the Community Assistance Team serves as a mechanism for tracking efforts to evaluate and assess environmental pollutants of interest to communities, including those communities where there are EJ issues.

### **C. Action for Tribal Communities**

OPPT's Tribal program was developed in 1997 with the assistance from other EPA offices, the National Indian Workgroup, the EPA's Tribal Operations Committee, the OPPT Forum on State and Tribal Toxics Action (FOSTTA), and members of Native American tribes. OPPT is committed to working in partnership with tribal governments to safeguard and protect the environment from toxic hazards and to promote pollution prevention in Indian country. OPPT has taken steps to foster better communication links through its newly established tribal program.

The first priority of this program is improving communication so that we can better exchange information regarding environmental concerns and issues facing Indian country today. In August 1999, OPPT published a resource guide for Indian Tribes of OPPT programs, resources, and grant opportunities and distributed it to all Federally Recognized Tribes and Tribal Organizations. This guidance is updated on a periodic basis with formatted inserts that are published in the OPPTS Tribal News. The OPPTS Tribal Newsletter offers various information on a variety of topics regarding OPPTS environmental programs, and includes a variety of news articles and information from the Tribes and Tribal organizations themselves. This publication has grown in readership and recognition from our Tribal partners and continues to enjoy a wide distribution in Indian Country and at EPA. This newsletter also has featured many stories and articles from the environmental justice communities and from EPA's Office of Environmental Justice.

OPPT's Forum on State and Tribal Toxics Action (FOSTTA) Tribal Affairs Project is a mechanism for tribes to provide EPA with valuable program expertise from the tribal perspective. Tribal representation on this project come from a variety of environmental and health officials.

OPPT is continuing to make progress on the National Subsistence/Traditional Lifeways Project. The purpose of the project is to increase Tribes' ability to assess environmental threats from toxic chemicals and pesticides, including persistent, bioaccumulative toxics (PBTs) and

radionuclides, in foods and other materials important to Tribal cultures, to recommend action on the part of EPA and the tribes, and to strengthen collaboration across EPA and the Federal government on this critical issue.

The Tribal Program engaged the efforts of the Partnership for Environmental Technology Education (PETE) to coordinate a network of Tribal Colleges for the purpose of conducting an All Nations Tribal College Environmental Program Capacity Building Workshop that was held in November 2001 in Des Moines, Washington. A formalized report of recommendations from the workshop attendees was included in the OPPTS Tribal Strategic Plan.

Beginning in 2001 and continuing in 2002, OPPT developed two new grant programs exclusively for Native American Tribes. The purpose of one grant program is to conduct a lead (Pb) baseline assessment of pre-1978 Tribal homes (paint, soil, and dust sampling for lead and blood-lead screening of children). The second grant program will conduct lead educational outreach activities in Native American Tribal communities.

### **III. Actions to Improve Integration of EJ into OPPT**

OPPT is committed to continual organizational engagement and program support with the following goals:

- To ensure that all staff and managers understand the concept of EJ and its impact on programmatic activities and its constituencies.
- To ensure EJ is considered as part of all operational planning efforts and incorporated into project activities where appropriate.

To accomplish these goals, OPPT will work to further incorporate EJ principles into project activities and policy development that substantially affect human health and the environment in a manner that ensures the fair treatment of all people, including people-of-color populations and/or low income populations. OPPT will provide training to increase staff's sensitivity of EJ issues. OPPT will encourage greater public participation in the development and implementation of its regulations, policies, and programs.

In particular, special consideration will be given to emerging programs or requirements such as mercury. OPPT will be helping the Agency develop and implement new, targeted strategies to reduce mercury exposure of key audiences most at risk. OPPT activities will include (1) participating in development of EPA's mercury-specific website; (2) drafting a risk communication strategy for mercury that will include a more effective and integrated community-based approach; and (3) partnering with other stakeholder groups (e.g., state, local and tribal governments; medical professionals; educational institutions; and the private sector) to address holistically the various and complex issues related to mercury use, release and exposure.

OPPT will ensure that issues of particular interests to EJ communities are represented in

the Working Group on the Sound Management of Chemicals (SMOC) under the North American Commission on Environmental Cooperation (NACEC).

OPPT will continue to work on outreach and educational efforts regarding lead, especially in older, disadvantaged communities with EJ concerns. It will monitor and report on the development, distribution and evaluation of television public service announcements (PSAs) and doctor's office posters under a federal grant targeted at informing Latino communities to test children for lead poisoning.

#### **IV. EJ Coordinator and OPPT Coordination with EJ Committees and Workgroups**

OPPT has appointed an environmental justice coordinator who will be responsible for a number of environmental justice components such as developing a training program for current and new OPPT employees in EJ awareness; working with OPPT divisions to increase awareness of EJ opportunities; coordinating with stakeholders on issues of environmental justice; developing reports and responding to inquiries; participating in meetings, workshops, and related meetings; and developing mechanisms to communicate with other agency programs on EJ issues.

OPPT will identify and solicit issues that may be of concern to the appropriate EJ subcommittees or NEJAC representatives. OPPT plans to keep abreast of programs, initiatives and other actions planned by the various EJ committees. OPPT will provide support to the committees and subcommittees as needed. OPPT will continue to consider EJ implications and identify the most effective approach to ensure inclusion in the planning, implementation, and evaluation of reducing risks.

**SECTION III. ENVIRONMENTAL JUSTICE ACTION PLAN MATRIX**

Below are the completed matrices for the various programs discussed in the previous section. These matrices further delineate the activities and resources OPPTS has committed to the EJ effort.

**A. OPP ENVIRONMENTAL JUSTICE STRATEGIES AND ACTIVITIES**

**1. Risk Assessment Component**

**GOAL #1:** Assess level of exposure to pesticides from drinking water and aquatic dietary sources for targeted communities.

Strategies	Activities	Duration/ Due Date	Program Evaluation	Perf Measures	Resources (FTE/\$)	Lead Contact
1. Collaborate with Office of Water on Fish Advisories for Pesticides	1a. Identify chemicals that are toxic, persistent, and have the potential to bioaccumulate in fish. 1b. Work with Office of Water to determine process for providing fish bioaccumulation information on these chemicals 1c. OW will consider this information when developing their fish advisories.	1a. On-going	FY 2004	1a. List of chemicals  1b. Identify process	0.01 FTE	EFED Pat Jennings

**GOAL #2:** Provide disadvantaged communities or sub-populations the ability to ascertain risks in their environment

Strategies	Activities	Duration / Due Date	Program Evaluation	Perf Measures	Resources (FTE/\$)	Lead Contact
Provide analytic support to disadvantaged communities	Analyze samples for contaminants that may expose disadvantaged communities to risks, as resources permit	Ongoing	FY 2004	Analytic results	1.5 FTE	BEAD Aubry Dupuy Dick Griffith Susan Lawrence

**GOAL #3:** Improve Environmental Justice Risk Assessment Capabilities - Improve risk assessment models to potentially allow OPP to better identify risks of concern for vulnerable subpopulations (i.e., Native Americans, Hispanics, etc.).

Strategies	Activities	Duration/ Due Date	Program Evaluation	Perf Meas.	Resources (FTE/\$)	Lead Contact
1. Improve exposure models for ability to assess dietary exposure to sub-populations	1a. Assess current ability of models to describe exposure to sub-populations 1b. Determine modifications/ data necessary to upgrade model	1a.ongoing 1b.ongoing	FY 2004	list of modifications	1a. 0.1 FTE 1b. 0.1 FTE \$200K	HED Bart Suhre

Strategies	Activities	Duration/ Due Date	Program Evaluation n	Perf Meas.	Resources (FTE/\$)	Lead Contact
2. Improve Pesticide Handlers Exposure Database	2. Refine and assess the data base to determine data needed for improvement	8/03	FY 2004	list of data elements needed	0.05 FTE	HED Jeff Evans

**GOAL #4:** Improve Bystander/Spray Drift Risk Assessment - Improve risk assessments for communities near agricultural sites; such as farm/migrant worker children.

Strategies	Activities	Duration/ Due Date	Program Evaluation n	Perf Meas	Resource s (FTE/\$)	Lead Contact
1. Improve information about sources of exposures for use in risk assessment; potential for modeling	1a. Research in cooperation with ORD to determine sources of exposures that contribute to increased levels of pesticide metabolites in farm worker children, as resources permit	1a. 2005	FY 2005	Measures in Development	1a. 0.4 FTE	HED Jeff Evans

## 2. Risk Management Component

**GOAL #1:** To ensure that sub-populations do not bear a disproportionate share of exposure or potential risk associated with pesticide use

Strategies	Activities	Duration/ Due Date	Program Evaluation	Perf Measures	Resources (FTE/\$)	
1. Assess process for applying EJ principles to reregistration/re-assessment of older pesticides	1a. Identify three chemicals with potential for increased exposure to sub-populations to use as pilot	1a. FY 2003	FY 2003	1a. list of chemicals with potential for these risks 1b. Risk assessment with available data for unique/sub-population exposure 1c. Signed RED with EJ mitigation and possible label improvements 1d. Could lead to an EJ strategy that addresses groundwater, farm workers, and urban populations.	1a. 0.05 FTE	SRRD Branch Chiefs  Assigned Staff
	1b. Conduct risk assessments for the sub-populations.	1b. FY 2003	FY 2003		1b. OPP Science Div.	
	1c. Address identified risks through risk management	1c. FY 2003-2004	FY 2004		1c. 0.15 FTE	
	1d. Develop EJ strategy for reregistration of existing chemicals based on pilot, if applicable.	1d. 12/04	FY 2005		1d. 0.05 FTE	
2. Implement EJ strategy for reregistration	2a. Develop EJ questions to be included in existing reregistration checklist.	2a. FY 2003	FY 2003	2. Checklist Implemented with an EJ component.	2a. 0.05 FTE	SRRD Jackie Mosby
	2b. Review and approve the EJ section of the checklist.	2b. FY 2003	FY 2003		2b. 0.02 FTE	
3. EJ Training in SRRD	3a. EJ Training to be added to existing reregistration training modules. 3b. Define EJ for reregistration of existing chemicals 3c. EJ Checklist	3. FY 2003	FY 2003	3. SRRD Training Module with EJ Included.	3a. 0.05 FTE	SRRD Jackie Mosby

**GOAL #2:** Improve management of the risks of existing pesticides in relation to exposed sub-populations

Strategies	Activities	Duration/ Due Date	Program Evaluation	Perf Measures	Resources (FTE/\$)	Lead Contact
1. Continue to collaborate with stakeholders, Regions, unique population groups, etc.	1a. Identify stakeholder representatives for various groups. 1b. Conference calls with groups to obtain and pass on information.	1a. 1 month after initial pesticide team meeting. 1b. Ongoing	FY 2004	1a. Meetings/ conf. calls 1b. Meetings/ conf. calls	1. 0.05 FTE	SRRD Assigned Staff
2. Ask for comments on unique/sub populations affected by decision	2. Incorporate EJ questions/language into the Notice of Availability Template	2. FY 2003	FY 2003	2. Published FR Notice with EJ questions	2. 0.05 FTE	SRRD Assigned Staff
3. Incorporate EJ into the reregistration Peer Review Process	3. Provide EJ questions to Peer Review Workgroups	3. FY 2003	FY 2003	3. Peer Review Recommendations	3. 0.05 FTE	SRRD Peer Review Work Groups

**GOAL #3:** Improve the integration of EJ principles into the antimicrobial regulatory process to ensure the protection of sub-populations.

Strategies	Activities	Duration/ Due Date	Program Evaluation	Perf Measures	Resources (FTE/\$)	Lead Contact
Evaluate opportunities to incorporate environmental justice considerations in Antimicrobial pesticide programs	Review programs such as ecological assessments for antifoulant leakage and fish contamination in sub-populations, urban hospital disinfectants use and correlations to compromised immune systems and antimicrobial resistance issues; and CCA wood preservatives treatment facilities location, disposal, incineration, and public information exchange.	FY 2003	FY 2003	ID areas for attention to EJ issues	0.05 FTE	AD Cleo Pizana

**GOAL #4:** To ensure that sub-populations do not bear disproportionate exposure or potential risk from conventional pesticide registration programs

Strategies	Activities	Duration/ Due Date	Program Evaluation n	Performanc e Measures	Resource s (FTE/\$)	
1. Assess process for applying EJ principles to conventional pesticide registration programs	1. Review programs and processes to identify potential areas to implement EJ considerations	1. FY 2003-2004	FY 2004	Identification of areas for attention to EJ issues	0.05 FTE	RD Linda Arrington

### 3. Field Component

**GOAL #1:** Better protect farm workers and their families from pesticide exposures through improved regulation and training

Strategies	Activities	Duration/ Due Date	Program Evaluation n	Perf Measures	Resources (FTE/\$)	Lead Contact
1. Assessment of existing worker protection program	1a. Evaluation of input from stake-holder workshops 1b. Hazard communications pilot development 1c. Pilot Train the Trainer programs with focus on children in migrant stream states	1. Complete in FY 2003	FY 2003	1a. Pilot assessments 1b. Regulatory change recommended	1. 0.2 FTE/ \$300,000 1b. 0.1 FTE \$75,000 1c. 0.1 FTE \$75,000	1a. FEAD Kevin Keaney 1b. FEAD Richard Pont 1c. FEAD Mike Walsh
2. Improve availability of information for farm workers and their families	2a. Hispanic Radio Network spots with pesticide safety information 2b. Improve safety training for farm worker families through grants	2. Ongoing, as funding allows	FY 2004	2a. HRN call-backs and survey 2b. Pre- and post-tests	2a. 0.1 FTE \$50,000 2b. 0.05 FTE \$100,000	2a. FEAD Carol Parker 2b. Carol Parker
3. Share protection programs with other governments	3. Bilateral project with Mexico on worker protection: pilot programs	3. Ongoing monitoring and guidance	FY 2004	3. Monitoring tools for results	3. 0.1 FTE \$15,000	3. FEAD Kevin Keaney

**GOAL #2:** Improve Public Health relative to pesticide exposure and risk *(continued on page 22)*

Strategies	Activities	Duration/ Due Date	Program Evaluation	Performance Measures	Resources (FTE/\$)	Lead Contact
1. Monitor public health relative to pesticide exposures	1a. Collect sentinel poisoning incident data through IAG (SENSOR), as resources permit	1a. Ongoing	FY 2004	1a,b. Data bases for risk assessment use  1c. Report on findings	1a. 0.1 FTE	1. FEAD Artensie Flowers
	1b. Multi-agency pilot study with Texas Health Dept to monitor public health from non-occupational sources	1b. FY 2003	FY 2003		1b. \$100,000	
	1c. Multi-agency epidemiology study of long-term effects on certified applicators and families	1c. FY 2003	FY 2003		1c. 0.1 FTE	
2. Address issues of exposures to farm workers and their families	Assessment of information from National Agricultural Workers Survey	FY 2003	FY 2003	Reports and data bases for program use	0.1 FTE	FEAD Artensie Flowers
3. Improve recognition, management, and prevention of pesticide-related health conditions	Provide health care professionals training and education on pesticide health issues.	FY 2003	FY 2003	National Forum	0.1 FTE	FEAD Artensie Flowers

**GOAL #3:** Strengthen pesticide program development, support, and implementation in Indian country.

Strategies	Activities	Duration/ Due Date	Program Evaluation	Performance Measures	Resources (FTE/\$)	Lead Contact
1. Improve the ability of tribes to define, design, implement and sustain well rounded pesticide management practices suited to the needs of Indian country.	1a. As funding allows, provide ongoing support for tribal pesticide circuit rider programs.	1a. Ongoing	FY 2004	1a. Active circuit rider program in effect.	1a. 0.05 FTE \$65,000	1a. FEAD Karen Rudek
	1b. Work with USDA/APHIS to develop and refine a mechanism whereby exemptions to FIFRA Section 18 may be made available to address pesticide emergencies in Indian country.	1b. FY 2003	FY 2003	1b. Mechanism in place	1b. 0.1 FTE	1b. FEAD Kennan Garvey

**GOAL #4:** Enhance and modify risk management to meet tribal cultural concerns.

Strategies	Activities	Duration/ Due Date	Program Evaluation	Perf. Measures	Resource s (FTE/\$)	Lead Contact
<p><b>1.</b> Improve the ability of both EPA and tribes to evaluate the scope and magnitude of human pesticide exposure risks in Indian country.</p>	<p><b>1a.</b> Develop software modules that will model pesticide and chemical risk exposures for practitioners of traditional cultural ways of life in two biogeographical areas of the country.</p>	<p><b>1a.</b> FY 2003-11/04</p>	<p>FY 2004</p>	<p><b>1a.</b> Complete modules</p>	<p><b>1a.</b> 0.20 FTE/ \$214,000</p>	<p>FEAD Karen Rudek</p>
	<p>Evaluate the benefits of extending the effort to tribes in other parts of the country. Depending on outcome and resources, fund and expand project.</p>	<p>12/04 - FY 2005</p>	<p>FY 2005</p>	<p>Complete evaluation and continue project if appropriate</p>	<p>0.05- 0.25 FTE</p>	
	<p><b>1b.</b> Provide funding support to bring a team of medical doctors, epidemiologists, and other pesticide experts into Indian country to provide training in the elimination, identification and treatment of pesticide exposure related illnesses among community members, farm workers, and others.</p>	<p><b>1b.</b> FY 2003</p>	<p>FY 2003</p>	<p><b>1b.</b> Complete training for tribes in two areas of the country</p>	<p><b>1b.</b> 0.1 FTE/ \$100,000</p>	

**GOAL #5: Build Tribal Capacity**

Strategies	Activities	Duration/ Due Date	Program Evaluation	Perf Measures	Resources (FTE/\$)	Lead Contact
<p><b>3.</b> Support tribal development of increased and broadened in-house, pesticide related expertise.</p>	<p><b>3a.</b> Provide competed tribal grants for targeted, pesticide related “field projects” such as water quality management and endangered species protection.</p>	<p><b>3a.</b> Ongoing</p>	<p>FY 2004</p>	<p><b>3a.</b> Award grants and follow up on success rates</p>	<p><b>3a.</b> 0.15 FTE/ \$245,500</p>	<p>FEAD Karen Rudek</p>
	<p><b>3b.</b> Provide tailored water quality/pesticide management workshops in Indian country for tribal environmental managers, along with follow up information by way of written pesticide news update mailings.</p>	<p><b>3b.</b> Ongoing</p>	<p>FY 2004</p>	<p><b>3b.</b> Host three workshops per year, including one advanced workshop and begin written outreach publication.</p>	<p><b>3b.</b> 0.05 FTE/ \$185,000</p>	
	<p><b>3c.</b> As funding allows, provide resources to EPA regional offices to enable them to supplement other pesticide program funding to tribes.</p>	<p><b>3c.</b> Ongoing</p>	<p>FY 2004</p>	<p><b>3c.</b> Determine and fund regional distribution</p>	<p><b>3c.</b> 0.05 FTE</p>	

**Goal #6: Improve consultation, communication, and outreach with Tribes**

Strategies	Activities	Duration/ Due Date	Program Evaluation	Perf Measures	Resources (FTE/\$)	Lead Contact
<p><b>4.</b> Work closely with tribes to identify national pesticide issues that are of significant concern to tribal populations. Ensure that tribes are appropriately brought into stakeholder discussions of such issues, and that tribal concerns are considered during OPP's decision making processes.</p>	<p><b>4a.</b> Continue to work in close partnership with Tribal Pesticide Program Council (TPPC) members to clearly identify the pesticide related concerns of Indian country.</p>	<p><b>4a.</b> Ongoing</p>	<p>FY 2004</p>	<p><b>4a.</b> Two national meetings/year; monthly conference calls; Regular contact with TPPC facilitator</p>	<p><b>4a.</b> 0.25 FTE/ \$180,000</p>	<p><b>4a.</b> FEAD Georgia McDuffie and Karen Rudek</p>
	<p><b>4b.</b> Ensure that appropriate EPA decision makers are aware of Indian country's pesticide related concerns, and take those concerns into consideration when making regulatory decisions.</p>	<p><b>4b.</b> Ongoing</p>	<p>FY 2004</p>	<p><b>4b.</b> Regularly scheduled in-house information sharing meetings at all levels.</p>	<p><b>4b.</b> 0.3 FTE</p>	<p><b>4b.</b> Karen Rudek, Georgia McDuffie, GISB/ FEAD management</p>
	<p><b>4c.</b> Disseminate information on EPA projects, programs, emerging issues and grant opportunities that may affect and/or be of interest to pesticide program managers in Indian country.</p>	<p><b>4c.</b> Ongoing</p>	<p>FY 2004</p>	<p><b>4c.</b> OPPTS Tribal Newsletter. E-mail to tribes through Native Ecology Initiative grantee. telephone calls to tribal environmental managers, tribal governmental leaders, tribal consortia and others as needed.</p>	<p><b>4c.</b> 0.1 FTE/ \$12,000</p>	<p><b>4c.</b> Karen Rudek and Georgia McDuffie</p>

**GOAL #7:** To communicate pesticide safety information to high-risk audiences in urban, low-income, and ethnically diverse communities across the nation. *(Continued on next page)*

Strategies	Activities	Duration/ Due Date	Program Evaluation	Perf Measures	Resources (FTE/\$)	Lead Contact
1. To communicate pesticide safety information in an easily accessible manner	Washington, DC Metro Advertising Campaign - pesticide safety ads (English/Spanish) currently running on 550 buses and 10 subway stations in many urban, low-income minority communities.	Completed Aug 1- Sept 1	FY 2003	Metro will provide count of number of passengers	0.1 FTE/ \$12,000	FEAD Ronald Jackson
2. To provide information on pesticide safety to people frequenting public health clinics.	Washington, DC Public Health Clinics - OPP has given a grant to the University of the District of Columbia's (UDC) Extension Service to provide pesticide safety information to patients at public health clinics in minority communities in Washington, DC.	1 year July/02 - July/03	FY 2003	Direct feedback from patients and from clinic staff. Number of give-a-way bags distributed, and attendance at training sessions	0.1 FTE/ \$22,872	FEAD Kathy Seikel
3. To provide information electronically to ethnically diverse communities.	Distributing Pesticide Information to the People of Color Directory - OPP has included more than 300 groups from the People of Color Environmental Groups Directory to our LISTSERV. OPP regularly sends pesticide-related public alerts, press announcements, actions, and decisions to the LISTSERV.	Regularly/ As determined	FY 2004	OPP is currently developing a measuring tool to receive feedback from the LISTSERV.	0.1 FTE	FEAD Ronald Jackson
4. To use the public education system to disseminate information on pesticide safety to children.	New Mexico Family, Career, community Leaders - Through an OPP grant, New Mexican community leaders would use the Agency's Read the Label First! materials to develop ready-to-use, age appropriate, teacher-friendly learning plans and suggested classroom projects. The grantee will also promote the use of these materials in Family and Consumer Life Science classes (secondary school level) nationwide.	1 year	FY 2003	Grantee will develop teacher and student evaluation instruments that solicit feedback regarding the effectiveness of the materials, how they were utilized, and how well they were received.	0.1 FTE/ \$24,456	FEAD Kathy Seikel

Strategies	Activities	Duration/ Due Date	Program Evaluation	Perf Measures	Resources (FTE/\$)	
5. To provide information on pesticide safety to disadvantaged people using government services.	<p><b>5a.</b> Partner with USDA's Woman, Infants and Children Program (WIC) to provide pesticide safety information to food stamp suppliers, users, and others.</p> <p><b>5b.</b> Partner with DHHS Head Start Program to provide pesticide safety information to Head Start Center Directors, staff and parents.</p> <p><b>5c.</b> Partner with Low-Income/Public Housing Groups to provide outreach materials to residents. Possible partners include National Low Income Housing Coalition, Council of Large Public Housing Authorities, and the National Association of Housing and Redevelopment Officials.</p> <p><b>5d.</b> Partner with the American Association of Poison Control Centers to provide centers with pesticide safety information to distribute to callers</p>	1 year pilot	FY 2003	Performance measures would be based on the number of publications distributed.	0.1 FTE	FEAD Darlene Dinkins and Kathy Seikel

**GOAL #8:** To assist the public with concerns about pesticide exposures

Strategies	Activities	Duration/ Due Date	Program Evaluation	Perf Measures	Resources (FTE/\$)	Lead Contact
1. Assist individuals who may have been exposed to a pesticide, or suffered a toxic or adverse effect or may suffer a delayed or chronic adverse effect in the future. Also, provide easy access to information regarding pesticides and pesticide-related issues. Overall, to reduce pesticide risk to all individuals/populations.	<b>1a.</b> The Pesticide Incident Response Officer (PARO) will respond to pesticide incidents.	<b>1a.</b> Ongoing	FY 2003	<b>1a.</b> Number of calls	<b>1a.</b> 0.10-0.20 FTE	IRSD Frank Davido
	<b>1b.</b> Continue the National Pesticide Medical Monitoring Program (NPMMP) cooperative agreement.	<b>1b.</b> 12/31/03	FY 2004	<b>1b.</b> number of cases investigated	<b>1b.</b> 0.02 FTE/\$4600	
	<b>1c.</b> Continue the National Pesticide Information Center (NPIC) cooperative agreement.	<b>1c.</b> 03/31/05	FY 2003	<b>1c.</b> Number of calls	<b>1c.</b> 0.05 FTE/\$132,750	

**GOAL #9:** To increase understanding and awareness of Environmental Justice by EPA staff.

Strategies	Activities	Duration/ Due Date	Program Evaluation	Perf Measures	Resources (FTE/\$)	Lead Contact
1. Train OPP EJ trainers to provide adequate EJ training throughout OPP.  2. Provide EJ training to OPP	1. Work with OEJ to provide training sessions to train OPP EJ trainers.	1. FY2003	FY 2003	1. Adequate # of OPP EJ trainers	0.3 FTEs	RD Terri Stowe Linda Arrington
	2a. Form an EJ Trainers Workgroup to design a 1-day EJ Workshop for OPP.	2a. FY2003	FY 2003  FY 2003	Incorporating EJ into OPP work.	0.5 FTEs	RD Terri Stowe Linda Arrington
	2b. As funding is available, develop materials for EJ Workshop.	2b. FY2003	FY 2004			
	2c. Schedule EJ Workshops for OPP.	2c. FY2003-2004				

### 3. Benefits Component

**GOAL#1:** To investigate and determine if the potential use of pesticide has a role in the reduction or stimulation of environmental disease such as asthma in urban areas.

Strategies	Activities	Duration/ Due Date	Program Evaluation	Performance Measures	Resources (FTE/\$)	Lead Contact
1. Develop a strategic plan for OPP to follow in evaluating the relationship between asthma and pesticides.	1. Search public literature, compile and analyze information, and assess issues related to pesticides, pest control, and asthma, and develop options to address them.	1a,b,c. Completed in FY2002	FY 2003	1a,b,c. Completed	1.0 FTE	RD William Sproat
	1d. Draft guidance for labeling pesticides to carry asthma claims	1d. FY2003	FY 2003	1d,e. <b>Interim Measure of success:</b> Development of OPP policy document, i.e., PR Notice for pesticide use for control of asthma-causing pests.		
	1e. Finalize guidance	1e. FY2004	FY 2004	<b>Primary Measure:</b> Register asthma-safe pesticide products that are efficacious against asthma causing agents		
	1f. Develop outreach methods to educate the public about controls including the use of pesticides	1f. FY2004	FY 2004			

### B. Office of Pollution Prevention and Toxics

## A. Risk Management

### Goal #1: Advance EJ issues within the Agency's national chemicals program

Strategies A. General	Activities	Duration/ Due Date	Performance Measures	Resources (FTE/\$)	Lead Contact
1. Plans for informing staff of strategies, approaches, and their EJ responsibilities	1a. Adapt National EJ Training Collaborative plan in (2) below	06/03	Complete final plan	0.15	Designated Staff (DS)
	1b. Update draft plan	08/03		0.1	DS
	1c. Implement final plan	01/04		0.1	DS
2. Develop Grants and Contracts Guidance	2a. Participate in OPPT workgroup	Ongoing	Complete final guidance Complete training	0.05	DS
	2b. Develop interim guidelines	08/03		0.1	DS
	2c. Review and comment of interim guidelines by EJ Council	12/03		0.1	DS
	2d. Develop final guidance	01/04		0.1	DS
	2e. Conduct staff training.	06/04		0.2	DS
3. Develop Permitting Guidance	Develop permitting guidance in tandem with item strategy 2 above	06/04	Complete permitting guidance	0.1	DS
4. Develop Public Participation Guidance	4a. Work with the Headquarters' Public Relation Liaison to ensure collaborative efforts in integrating Public involvement and EJ policies into NPCD programs	Ongoing	Continue ongoing work with HQ Public Relation Liaison	0.05	Outreach Team
	4b. Solicit stakeholders feedback on public involvement with under represented groups as part of the stakeholders input meetings	Ongoing	Continue working with stakeholders	0.05	Outreach Team
5. Incorporate EJ into program, policy, and outreach activities	5a. Develop plan to implement, incorporate EJ into program, policy, and outreach activities	06/03	Incorporate EJ into all activities	0.1	Designated Staff (DS)
	5. Review/approval of draft plan	12/03		0.1	DS
	5c. Implementation of final plan	06/04		0.1	DS

**Goal #2:** Improve management of the risks of lead poisoning of exposed sub-populations

Strategies B. Lead Program	Activities	Duration/ Due Date	Performance Measures	Resources (FTE's)	Primary Contact
Overall Lead Program	defined in strategies below	Ongoing	Number of lead-poisoned children (Target: 200,000 by 2006)  Number of homes with dust lead hazards (Target: TBD -Pending baseline data availability)		Simpson/Morony

Strategy 1: Promote greater availability of lead risk identification and reduction, at lower cost	Granted authorization for training & certification programs	Complete/ongoing	Number of authorized States, Tribes, and territories (Target: on hold pending rule revisions & additions)		Simpson
	Implemented Federal training and certification program	Complete/ongoing	Number of people trained (Target: 5% growth per year)		Simpson
	Developed and distributed training courses	Complete/ongoing			Simpson
	Developed rule on training and certification for lead-based paint professionals	Complete*			Simpson
	Perform technical studies and product reviews to identify ways to assess and reduce lead risks at lower cost	Ongoing	Average price of testing, risk assessment, abatement (Target: 2% reduction per year, adjusted for inflation)		Morony
	Provide appropriate free courses in high-risk "hot spots" and encourage attendance			\$90K	Simpson
	Evaluate children's blood lead levels in Indian country and develop programs through grants where appropriate			\$1.2M	Morony

Strategy 2: Empower parents and other caretakers to protect children directly	Developed pre-renovation information rule	Complete*			Simpson
	Developed lead-based paint real estate disclosure rule	Complete*			Simpson
	Manage bilingual National Lead Information Center including hotline and clearinghouse	Ongoing		\$312.6K	Morony
	Developed and distributed educational materials and national lead awareness campaigns	Ongoing	Level of understanding & personal protective action (Target TBD)	\$150K	Morony
	Initiated partnerships to conduct lead awareness activities targeted to at-risk populations			TBD	Morony
	Provide outreach to highest risk groups in conjunction with other programs			TBD	Morony
	Identify key needs & provide materials and translations			TBD	Morony

Strategies B. Lead Program	Activities	Duration/ Due Date	Performance Measures	Resources (FTE's)	
Strategy 3: Encourage improved maintenance of low-income dwellings	Develop positive/ negative incentive program for low- income landlords	Ongoing	Number of lead- poisoned children (Target: 200,000 by 2006)	TBD	Simpson
	Establish appropriate recognition for private sector “volunteers”		Number of homes with dust lead hazards (Target: TBD -Pending baseline data availability)	\$50K	Simpson
	Assemble group with emphasis on commitment to 1015 implementation & follow-through			\$10K	Simpson
	Establish voluntary R&R outreach, training, & certification program; develop public awareness tools to increase value, attractiveness, & demand for lead- safe activities			TBD	Simpson/Morony

## B. Risk Identification and Reduction/Prevention

**Goal # 1** Provide EJ Communities with the ability to evaluate, prioritize and identify options to reduce risks to health and the environment

Strategies	Activities	Duration/ Due Date	Performance Measures	Resources (FTE/\$)	
1. Develop tools to help communities understand and improve their environments	Complete and disseminate How-to-Manual for prioritizing and identifying options to reduce risk	FY '03	How-to Manual is published	0.2 FTE \$39K	Hank Topper
	Modify tools (RSEI, E-FAST, IGEMS) to more effectively support EJ communities	FY '03-'04	Reporting via Community Assistance Network conference calls, voluntary reporting	0.2 FTE \$100K (funding has not yet been allocated)	EETD
2. Provide tools and training to communities	Develop materials and provide training to Regions and States using the How-to Manual for EJ communities	FY '03	Materials are developed  2 workshops held	0.5 FTE \$75K (funding has not yet been allocated)	Hank Topper, EETD/RAD
	Provide technical support for tools and How-to Manual used by EJ communities	Ongoing	Reporting via Community Assistance Network conference calls, voluntary reporting	0.2 FTE	Hank Topper
	Facilitate communication on OPPT programs with EJ communities using Community Assistance Home Page	ongoing	Website use	0.2 FTE \$15K (funding has not yet been allocated)	Hank Topper

3. Provide technical support to communities using our tools, models, etc.	Continue Community Assistance Technical Team (CATT) to help communities and their partners translate and understand scientific data and find effective ways to improve the local environment	Ongoing	Successful community engagements	0.2FTE	EETD
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**Goal #2:** Fill hazard data gaps on high production chemicals and chemicals of concern to children by collecting and disseminating information for use by the public.

Strategies	Activities	Duration/Due date	Performance Measure	Resources	Lead Contact
A. Hazard/Risk identification of exposed population to HPV chemicals, including relevant subpopulations	<ol style="list-style-type: none"> <li>1. HPV Volunteer Initiative Commitment from Industry on Volunteer Initiative</li> <li>2. HPV Test Rule Issuance of Test Rule</li> <li>3. Collection of data <ul style="list-style-type: none"> <li>&gt; Evaluation of test plans</li> <li>&gt; Assessment of collected data</li> <li>&gt; Assessment of hazard</li> <li>&gt; Assessment of potential exposure</li> <li>&gt; Identification of potential risk to all affected parties</li> </ul> </li> <li>4. Public dissemination of information</li> </ol>	<p>done (date)</p> <p>done (date)</p> <p>ongoing</p>	<ol style="list-style-type: none"> <li>a. (number of chemicals)</li> <li>b. (number of chemicals)</li> <li>c. Publication of Q &amp; A</li> </ol>	part of larger program addressing all affected parties	CCD W. Penberthy
B. Hazard/Risk identification of exposed population to VCCEP chemicals, including relevant subpopulations	<ol style="list-style-type: none"> <li>1. VCCEP Volunteer Initiative</li> <li>2. VCCEP FRN</li> <li>3. Collection of assessments</li> <li>4. Public dissemination of information</li> </ol>	<p>done (date)</p> <p>done (date)</p>	<ol style="list-style-type: none"> <li>1. (number of chemicals)</li> <li>2. Publication of Q &amp; A</li> </ol>	part of larger program addressing all affected parties	CCD W. Penberthy

**Goal#3:** Address targeted areas of concern through support for the NEJAC Health & Research and P2 Subcommittees

Strategies	Activities	Duration/ Due Date	Performance Measures	Resources (FTE/\$)	
<b>1.</b> Identify ways to use cumulative risk assessment to address environmental health disparities in EJ communities	<b>a.</b> Work with the NEJAC subcommittee to identify assessment tools <b>b.</b> Work with subcommittee and agency experts to find ways to apply tools to EJ communities' health concerns	Mid- to Late-2003		0.1 FTE	Gary Carroll
<b>2.</b> Coordinate production of NEJAC report with workgroup co-chairs, contractor, and topic groups	<b>a.</b> Produce report by Fall of 2002 <b>b.</b> Brief OPPT management, OEJ, and NEJAC of report results	Fall, 2002	Produce report	0.1 FTE	Sharon Austin
<b>23.</b> Coordinate presentation of report at NEJAC public comment meeting in December 2002 meeting	<b>a.</b> Coordinate report out at national meeting <b>b.</b> Compile results from NEJAC meeting report-out for possible OPPT implementation	December 2002	Report issued	0.1 FTE	Sharon Austin

### C. Actions for Tribal Communities

**GOAL #1:** Strengthen toxic and pollution prevention program development, support, and implementation in Indian country.

Strategies	Activities	Duration/ Due Date	Performance Measures	Resources (FTE/\$)	
1. Improve the ability of tribes to define, design, implement and sustain well-rounded pollution prevention programs and activities that meet the future needs in Indian County.	1 OPPT is preparing a comprehensive Tribal guidance document to assist Tribes to implement pollution prevention program and activities. This document will contain tribal relevant materials through the assistance and compilation of research from the Oglala Lakota Tribal College who will be working with Partnership for Environmental Technology Education Organization on this guidance document. This guidance will be mailed to out to all federally recognized Tribes.	1.FY 2003-2004	1a. Document Completion	1a. 13k/ 0.1 FTE	Mary Lauterbach
2. Improve the ability of EPA and Tribes to identify the extent of lead exposure in Indian County.	2. To continue funding in FY 03, for the tribal set-aside grant program to implement blood-lead screening and lead awareness in Indian Country. <i>(ALSO mentioned under A. Goal #2)</i>	2a. FY 2003	2a. How many Indian children have been tested for lead poisoning/how many outreach programs	2a. \$1.2 mil./ 0.5 FTE	Darlene Watford
3. Improve ability of Tribes to conduct contaminant exposure and risk assessments related to a subsistence way of life	3a. To convene a technical meeting of Tribal scientists, elders, environmental directors, and tribal risk assessors to identify the tools necessary for tribes to conduct these assessments. The National Tribal Environmental Council and Alaska Native Science Commission are assisting in this effort.  3b. OPPT shall have implemented next phases of the OPPTS Tribal Subsistence Project that addresses aspects of Tribal Subsistence Risk Concerns	3a. FY 2003  3b. FY 2003	3a. The identification of a set of tools through a written report on findings  3b. Comp. next phase	3a. \$150K 0.8 FTE  3b. \$20 0.5FTE	Phil Robinson/ Darlene Harrod  Phil Robinson / Darlene Harrod

<p>4. To build Tribal capacity to assess environmental threats from toxic chemicals and pesticides, including persistent, bioaccumulative toxics (PBTs) and radio nuclides, in foods and other materials important to Tribal cultures.</p>	<p>4a. Provide competed tribal grants for targeted, PBT “field projects” such as doxin, pcbs, and other priority PBT protection.</p> <p>4b. Tribes will field test the tools and guidelines that will enable them to better understand and manage the contaminant exposure pathways and the resulting risks from the unique usages and circumstances associated with their culture, religion, and traditional ways of life.</p>	<p>4a. Ongoing.</p> <p>4b. Ongoing through FY 03-04</p>	<p>4a. Award grants and follow up on success rates</p> <p>4b. Number of Tribes testing tools</p>	<p>4a. \$ 500 K 1.0 FTE</p> <p>4b. 0.08 FTE</p>	<p>Paul Mathaii</p> <p>Phil Robinson/ Darlene Harrod</p>
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<p>5. Work closely with tribes to identify national toxic and pollution prevention issues that are of significant concern to tribal populations.</p>	<p>5a. Continue to work in close partnership with Tribal Affairs Project members of FOSTTA to clearly identify industrial chemical related concerns of Indian country.</p> <p>5b. Ensure that appropriate EPA decision makers are aware of Indian country's toxic and p2 related concerns, and take those concerns into consideration when making regulatory decisions.</p>	<p>5a. Ongoing</p> <p>5b. Ongoing</p>	<p>5a. Three national meetings/year Monthly conference calls Regular contact with facilitator</p> <p>5b. Regularly scheduled in-house information sharing meetings at all levels.</p>	<p>5a. \$ 90K .5 FTE</p> <p>5b. 0.1 FTE/</p>	<p>Darlene Harrod</p> <p>Mary Lauterbach</p>
<p>6. Ensure that tribes are appropriately brought into stakeholder discussions of such issues, and that tribal concerns are considered during OPPT's decision making processes.</p>	<p>6a. Disseminate information on EPA projects, programs, emerging issues and grant opportunities that may affect and/or be of interest to pesticide program managers in Indian country.</p>	<p>6a. Ongoing</p>	<p>6a. OPPTS Tribal Newsletter. E-mail to tribes through Native Ecology Initiative grantee. Telephone calls to tribal environmental managers, tribal governmental leaders, tribal consortia and others as needed.</p>	<p>6a. \$68K 0.8 FTE</p>	<p>Mary Lauterbach</p>

Strategies	Activities	Duration/ Due Date	Performance Measures	Resources (FTE/\$)	Lead Contact
7. Tribal EJ Program Evaluation	Prepare an annual OPPT Tribal EJ progress report on these activities	end of Calendar Year December 31st	Completion of the report	0.1 FTE	Mary Lauterbach

#### D. General

**Goal #1:** To increase understanding and awareness of Environmental Justice by EPA staff.

Strategies	Activities	Duration/ Due Date	Performance Measures	Resources (FTE/\$)	
1. Provide EJ training to OPPT	As resources become available, develop materials for workshop	FY2003		TBD	Gary Carroill
	Hold EJ workshop in OPPT	FY2003, 2004	workshop held		
2. Provide traditional science training to technical staff	As resources become available, work with tribal entity (eg NTEC) to develop training on traditional science.	Fy2003		TBD	Gary Carroll
	Hold training	FY2003,2004	training provided to OPPT technical staff		